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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9
10 VICTOR PEREZ, as Special Administrator of
the Estate of CARLOS PEREZ, deceased;
11 VICTOR PEREZ, as the Guardia Ad Litem for
S.E.P., a minor; VICTOR PEREZ, as the
Guardian Ad Litem for A.I.P., a minor,

12 Plaintiffs,
13 vs.

14 STATE OF NEVADA, ex.rel. NEVADA
DEPARTMENT OF CORRECTIONS;
15 DIRECTOR GREG COX, individually;
WARDEN DWIGHT NEVEN, individually;
16 ASSISTANT WARDEN TIMOTHY FILSON,
individually; COT. RAMOS, individually;
17 LIEUTENANT OLIVER, individually;
CORRECTIONS OFFICER CASTRO,
18 individually; CORRECTIONS OFFICER
SMITH, individually; and DOES I-X, inclusive;
19 and ROES I-X, inclusive,

20 Defendants.

CASE NO.: 2:15-cv-01572-APG-DJA

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

21 COMES NOW, Plaintiffs Victor Perez, as Special Administrator of the Estate of Carlos
Perez, deceased, Victor Perez as Guardian Ad Litem for S.E.P. and A.I.P., by and through his
22 counsel, Paola M. Armeni, Esq., and Gia N. Marina, Esq., of the law firm of Clark Hill, Defendant
Raynaldo Ramos, by and through his counsel, Robert W. Freeman, Jr. Esq., of the law firm of
23 Lewis Brisbois Bisgaard & Smith, LLP, Defendants, State of Nevada ex rel Nevada Department
of Corrections, James Greg Cox, Timothy Filson, Dwight W. Neven and Ronald Oliver, by and
24 through their counsel, Kiel Ireland, Esq. of the Attorney General's Office, Defendant Isaiah Smith,
by and through his counsel of record Jeffrey F. Barr, Esq. of the law firm of Ashcraft and Barr
25 LLP, and Defendant Jeff Castro, by and through his counsel, Craig Anderson, Esq., of the law firm
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LLP, and Defendant Jeff Castro, by and through his counsel, Craig Anderson, Esq., of the law firm

1 of Marquis Aurbach, hereby agree and stipulate to the dismissal of Plaintiffs' claims against
2 Defendants with prejudice. The parties have met the conditions of settlement and each party will
3 bear their own attorney's fees and cost.

4 APPROVED AS TO FORM AND CONTENT.

5 Respectfully submitted this 27th day of November 2023.

6 **CLARK HILL, PLLC**

7 /s/ Paola M. Armeni, Esq.

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20 *Attorneys for Defendant Isaiah Smith*

21 **LEWIS BRISBOIS BISGAARD &**

22 **SMITH LLP**

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27 *Attorneys for Defendants, State of Nevada,
Dwight W. Neven, James Greg Cox*

28 *Ronald Oliver, Timothy Filson*

22 **ORDER**

23 **IT IS SO ORDERED:**

24 DATED: November 28, 2023

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27 **ANDREW P. GORDON**
28 **UNITED STATES DISTRICT JUDGE**